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June 9, 2011

Ms. Jennifer T. Timian
Chief, Recall Management Division
Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Avenue SE
Washington, DC 20590

Subject: Ref. No. EQ11-003 –Agency Review of Safety
Recall 11V-255 Conducted by Pierce Manufacturing, Inc.

Dear Ms. Timian:

This is in response to your letter dated May 12, 2011 to Mr. Ken Hendrickson of Williams Controls, Inc. Your letter indicates that the agency is conducting a review relating to the above referenced safety recall initiated by Pierce Manufacturing, Inc. You requested that Williams provide a list of other purchasers of the same or similar electronic accelerator control assemblies as it sold to Pierce. We are pleased to cooperate with the agency in this review and to provide a list of customers, as requested. Please note the explanatory information provided below will provide some important background on this application.

The date of this response reflects the extension in response time granted by Mr. Alex Ansley of your staff on May 18, 2011. The revised date was to accommodate previously planned international travel by Williams executives.

The product purchased by Pierce is a generic component produced by Williams. These are products that would be selected by the engineering staffs of the purchasers in accordance with their specifications. The pedal assemblies purchased by Pierce for the vehicles addressed by Recall 11V-255 are Williams' item number 131507. It is essential to note that the Williams item number 131507 assemblies were modified by Pierce before they were installed in the subject vehicles.

Williams Controls would like to clarify that this potential "sticking" situation cannot occur unless two conditions happen simultaneously. The lever arm of the pedal must be subjected to excessive force resulting in permanent deformation of the lever arm and the pedal mounting must be such that the newly deformed lever arm will make tangential contact with the vehicle floor with the rotating treadle pad. The modifications that were completed by Pierce reduced the strength of the accelerator pedal assembly. That, in combination with the installed location, caused a potential "sticking" condition. Also you should note that applying minimal force to the upper portion of the treadle will eliminate the "sticking"

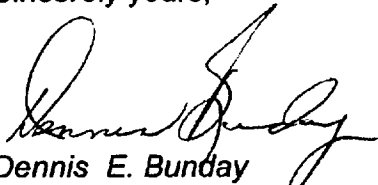
condition and release the pedal, even after permanent deformation. Significantly, Williams has never had a warranty claim or other notice, other than by Pierce on their modified pedal, due to lever arm permanent deformation for item number 131507.

Because the pedal assemblies involved in Recall 11V-255 comprise a modification by Pierce of the product originally sold to Pierce by Williams, we know of no "same or similar" pedal assemblies being used by other manufacturers. To the best of our knowledge and understanding, the pedal assembly that was modified and installed by Pierce in the vehicles that are the subject of Recall 11V-255 do not have equivalent operating characteristics to the over-the-counter model 131507 pedal assembly as sold by Williams to Pierce, nor to the installations and applications of any other customer who purchased the Williams item number 131507 pedal assemblies.

Notwithstanding the foregoing explanation, Williams is providing, in an Attachment, the list of customers that purchased item 131507. As best we can, we also will provide the additional details that you request regarding these customers. Any more detailed information regarding the companies and their products will need to be requested by the agency directly from them. As this customer list comprises confidential commercial material, Williams is submitting it in accordance with the agency's procedures for such submissions.

We hope this information is helpful to the agency. You may contact me directly with any question that may arise.

Sincerely yours,



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Attachment